

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

John Doe MC-1,

Plaintiff,

v.

The University of Michigan,  
the Regents of the University of  
Michigan,

Defendants.

Case No. 2:20-cv-10568-VAR-EAS

Hon. Victoria A. Roberts  
Magistrate Judge Elizabeth A. Stafford

**Master Case Filing**

**STIPULATED ORDER TO AMEND  
THE PROTECTIVE ORDER DATED JULY 9, 2020**

On July 9, 2020, a Protective Order (ECF No. 73) was entered. On January 21, 2021, a Stipulated Order to Amend the Protective Order Dated July 9, 2020 (ECF No. 131) was entered amending paragraph 11(l). On July 6, 2021, a Stipulated Order to Amend the Protective Order Dated July 9, 2020 (ECF No. 156) was entered adding subparagraph 11(n) and amending paragraph 29.

With the consent of the parties and the mediator, the parties stipulate to the following:

1. Subparagraph 11(n) is hereby amended to add a new paragraph, immediately below the amendment to the Protective Order provided by ECF No. 156, stating the following:

Any vendor, consultant, investigator, expert (collectively,

“Expert”) retained by insurer and/or its counsel or Expert’s staff, who is assisting with the Insurers’ review of the claims for insurance coverage for this case and any participation in the defense and/or resolution of underlying claims against the University, may be provided Confidential Information provided that the Expert agrees to be bound by the Protective Order and its Amendments and signs a copy of the Confidentiality Acknowledgement attached as Exhibit B.

2. All other provisions of the Protective Order dated July 9, 2020 and its Amendments, shall remain unchanged.

Dated: November 30, 2021

s/Victoria A.Roberts

Hon. Victoria A. Roberts  
United States District Judge

Stipulated to by:

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